

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

---

Kayshawn Chambers,

Civil File No.: 21-cv-2314 (JWB/DJF)

Plaintiff,

vs.

**STIPULATION FOR PARTIAL  
DISMISSAL  
WITH PREJUDICE**

Rice County (Minnesota), Rice County Sheriff Troy Dunn, individually, and in his capacity as Rice County Sheriff, Rice County Jail Nurse Nichole Sprow, individually and in her capacity as a Rice County Jail Nurse, Jillian Simon, individually and in her capacity as a Rice County Nurse Practitioner, Advanced Correctional Healthcare, Inc., CO Nicholas Bemis, individually, and in his capacity as Rice County CO, CO Cory Hutton, individually, and in his capacity as Rice County CO, CO Jason Krohn, individually, and in his capacity as Rice County CO, CO Tyson Neumann, individually, and in his capacity as Rice County CO, CO Alexzander Wachsmut, individually, and in his capacity as Rice County CO, CO Alison Fritz, individually, and in her capacity as Rice County CO, and CO Taylor Gazda, individually, and in her capacity as Rice County CO,

Defendants.

---

**IT IS HEREBY STIPULATED AND AGREED,** by and between Plaintiff Kayshawn Chambers and Defendant Advanced Correctional Healthcare, Inc., through their respective counsel, that Plaintiff's claims and Complaint against said Defendant may be, and hereby are dismissed on the merits with prejudice, and without costs, disbursements or

attorneys' fees to any party, and that a judgment of dismissal with prejudice may be entered in the above-entitled action pursuant hereto.

It is further stipulated and agreed that an appropriate Order for Judgment with Prejudice may be entered by the Court.

Date: April 18, 2023

By s/ Vincent J. Moccio  
Vincent J. Moccio (#0184640)  
Bennerotte & Associates, PA  
3085 Justice Way, Suite 200  
Eagan, MN 55121  
Telephone: (651) 203-5990  
vincent@bennerotte.com

*Attorneys for the Plaintiff*

**BASSFORD REMELE**  
***A Professional Association***

Date: April 19, 2023

By s/ Sarah M. Hoffman  
Sarah M. Hoffman (#389411)  
100 South 5th Street, Suite 1500  
Minneapolis, MN 55402-1254  
Telephone: (612) 333-3000  
Facsimile: (612) 333-8829  
shoffman@bassford.com

*Attorneys for Defendant Advanced Correctional  
Healthcare, Inc.*